

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Maxum Indemnity Company,)	
)	CIVIL ACTION FILE
Plaintiff,)	NO. 1:18-CV-01236-WSD
)	
vs.)	
)	
Colliers International – Atlanta, LLC, and)	
Alexander Deitch.)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF’S
RESPONSE TO DEFENDANT’S MOTION TO DISMISS FOR FAILURE
TO JOIN A PARTY UNDER RULE 19**

COME NOW Plaintiff Maxum Indemnity Company (“Plaintiff”) and Defendant Colliers International–Atlanta, LLC (“Defendant”), through undersigned counsel, respectfully request by consent an extension of the deadline to file Plaintiff’s Response to Defendant’s Motion to Dismiss for Failure to Join a Party Under Rule 19 with Memorandum of Law in Support (“Motion to Dismiss”) up to and including May 23, 2018, respectfully showing as follows:

1. Plaintiff filed its Complaint on March 23, 2018. (Doc. 1.)
2. Defendant filed its Motion to Dismiss on April 18, 2018. (Docs. 6 and 6-1.) Pursuant to Local Rule 7.1, the deadline for Plaintiff to file a Response to Defendant’s Motion to Dismiss is May 2, 2018.

3. Due to scheduling conflicts, including previously scheduled and out-of-town matters which have required Plaintiff's counsel to be away from the office, Plaintiff needs additional time to investigate Defendant's assertions and also needs additional time to prepare and file a Response to Defendant's Motion to Dismiss.

4. Counsel for the parties have conferred and have agreed to the extension of the deadline to file Plaintiff's Response to Defendant's Motion to Dismiss.

WHEREFORE, Plaintiff Maxum Indemnity Company and Defendant Colliers International–Atlanta, LLC respectfully request that this Court grant an extension of the deadline to file Plaintiff's Response to Defendant's Motion to Dismiss up to and including May 23, 2018. A proposed Order is attached hereto.

Respectfully submitted this 27th day of April, 2018.

PREPARED AND CONSENTED TO
BY:

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CERTIFICATE OF COMPLIANCE WITH TYPE REQUIREMENTS

Counsel for Plaintiff Maxum Indemnity Company hereby certifies that the foregoing has been prepared using Times New Roman 14-point font as required by Local Rule 5.1C.

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CERTIFICATE OF SERVICE

Counsel for Plaintiff Maxum Indemnity Company hereby certifies that the foregoing CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION TO DISMISS FOR FAILURE TO JOIN A PARTY UNDER RULE 19 was electronically filed on April 27, 2018, using the Court’s CM/ECF system which will electronically serve all counsel of record in this matter.

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